

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:16CR105
	:	
Plaintiff,	:	
	:	JUDGE DAN A. POLSTER
vs.	:	
	:	
JONIDA ALICKA, et al.,	:	<u>DEFENDANT'S UNOPPOSED</u>
	:	<u>MOTION FOR CONTINUANCE</u>
Defendants.	:	

Defendant, Jonida Alicka, through counsel respectfully moves this Honorable Court for a 60-day continuance of the trial and for a commensurate extension/continuance of all dates/deadlines in the pretrial order. Discovery in this matter is voluminous and also includes approximately 41 DVDs containing audio files from recorded conversations. Ms. Alicka, and her co-defendants, face substantial penalties if convicted of the allegations in the Indictment. Defense counsel states that additional time is needed to review the discovery, meet with Ms. Alicka, and confer with the Assistant U.S. Attorney to engage in plea negotiations. The requested continuance should allow sufficient time to address these concerns. The ends of justice served by granting this motion outweigh the best interests of Ms. Alicka and the public in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A). Assistant U.S. Attorney Robert F. Corts has indicated that he has no objection to this request.

For these reasons, Ms. Alicka requests the Court grant this motion.

Respectfully submitted,

/s/ Edward G. Bryan

EDWARD G. BRYAN (#0055556)

Assistant Federal Public Defender

1660 West Second Street, Suite 750

Cleveland, Ohio 44113

(216) 522-4856 Fax: (216) 522-4321

e-mail address: edward_bryan@fd.org.

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2016, a copy of the foregoing Notice of Discovery Requests was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Edward G Bryan

EDWARD G. BRYAN (#0055556)

Assistant Federal Public Defender